

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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CHEVRON CORPORATION,	:	
	:	
Plaintiff,	:	
	:	
v.	:	11 Civ. 0691 (LAK)
	:	
STEVEN DONZIGER, <i>et al.</i> ,	:	
	:	
Defendants.	:	
-----	X	

**PLAINTIFF'S AND DEFENDANTS' JOINT STATUS REPORT REGARDING THE
PRODUCTION OF GARR AND KOHN DOCUMENTS PURSUANT TO RULE 502(D)**

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STATUS REPORT

As directed by the Court, the parties respectfully submit this joint status report. Dkt. 1131. On or about May 9, 2013, pursuant to the joint request of Plaintiff Chevron Corporation (“Chevron”), Defendants Steven Donziger and his law offices, Defendants Hugo Gerardo Camacho Naranjo and Javier Piaguaje Payaguaje, Joseph C. Kohn and Kohn, Swift & Graf, P.C. (collectively, “Kohn”), and Laura Garr, the Court entered a Stipulation and Order relating to the documents on the privilege logs of Garr and Kohn. Dkt. 1126. Under the terms of that Stipulation and Order, on or about May 10, 2013, Chevron received approximately 9,000 Garr documents from Donziger’s counsel and approximately 29,000 Kohn documents from Kohn’s counsel. Given the number of documents and limited time, Chevron conducted an expedited, preliminary review of these documents. Of the approximately 9,000 Garr documents, Chevron has identified a subset of approximately 150 that it wants for immediate use during next week’s depositions through trial. Of the approximately 29,000 Kohn documents, Chevron has preliminarily identified a subset of approximately 300 that it wants for immediate use during next week’s depositions through trial. Chevron then met and conferred by telephone this afternoon and again this evening with counsel for Donziger, Camacho, Piaguaje, Kohn, and Garr. The parties have scheduled another meet and confer telephone call for tomorrow afternoon. The parties will update the Court as soon as they conclude the meet and confer process.

Dated: May 13, 2013
New York, New York

Respectfully submitted,
GIBSON, DUNN & CRUTCHER LLP

/s/ Randy M. Mastro

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